

Lexi J. Hazam (SBN 224457)  
*lhazam@lchb.com*  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-100

Christopher A. Seeger (*pro hac vice*)  
*cseeger@seegerweiss.com*  
SEEGER WEISS, LLP  
55 Challenger Road, 6th Floor  
Ridgefield Park, NJ 07660  
Telephone: (973) 639-9100  
Facsimile: (973) 679-8656

Previn Warren (*pro hac vice*)  
*pwarren@motleyrice.com*  
MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: (202) 386-9610  
Facsimile: (202) 232-5513

*Plaintiffs' Co-Lead Counsel*

Jennie Lee Anderson (SBN 203586)  
*jennie@andrusanderson.com*  
ANDRUS ANDERSON LLP  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: (415) 986-1400  
Facsimile: (415) 986-1474

*Plaintiffs' Liaison Counsel*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:  
*M.L., on behalf of minor A.W. v. Meta  
Platforms, Inc., et al., 4:23-cv-03801*

*F.R. filed on behalf of B.R. v. Meta  
Platforms, Inc., et al., 4:23-cv-04102*

*J.H. filed on behalf of minor C.H. v. Meta  
Platforms, Inc., et al., 4:23-cv-03842*

*A.H., filed on behalf of Minor A.R. v. Meta  
Platforms, Inc., et al., 4:23-cv-3798*

*L.L. on behalf of A.L. v. Meta Platforms,  
Inc., et al., 4:23-cv-04262*

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS IN SUPPORT OF PLAINTIFFS'  
FIFTH EX PARTE APPLICATION FOR  
APPOINTMENT OF GUARDIANS AD  
LITEM**

*K.C and on behalf of K.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-03179

*S.M., individually and on behalf of N.M. v. Meta Platforms Inc., et al.*, 4:23-cv-03978

Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) described in Plaintiffs’ Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) and attached as Exhibits 1-7 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Declaration”).

The Applications for which sealing is sought are:

- *M.L., on behalf of minor A.W. v. Meta Platforms, Inc., et al.*, 4:23-cv-03801  
(Exhibit 1)
- *F.R. filed on behalf of B.R. v. Meta Platforms, Inc., et al.*, 4:23-cv-04102  
(Exhibit 2)
- *J.H. filed on behalf of minor C.H. v. Meta Platforms, Inc., et al.*, 4:23-cv-03842  
(Exhibit 3)
- *A.H., filed on behalf of Minor A.R. v. Meta Platforms, Inc., et al.*, 4:23-cv-3798  
(Exhibit 4)
- *L.L. on behalf of A.L. v. Meta Platforms, Inc., et al.*, 4:23-cv-04262  
(Exhibit 5)
- *K.C and on behalf of K.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-03179  
(Exhibit 6)
- *S.M., individually and on behalf of N.M. v. Meta Platforms Inc., et al.*, 4:23-cv-03978

This motion is accompanied by a proposed order and the Declaration of Jennie Lee

Anderson In Support of Plaintiffs' Administrative Motion to File Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Decl. ISO Admin Motion") pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

This Court previously considered and finding good cause granted Plaintiffs' request to seal applications for guardians *ad litem* in this case. ECF No. 16.

Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs and Defendants have agreed to a standing stipulation that Applications may be filed under seal. In so stipulating, Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibit In Support of Plaintiffs' Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: September 19, 2023

Respectfully submitted,

**ANDRUS ANDERSON LLP**

/s/Jennie Lee Anderson

Jennie Lee Anderson

*jennie@andrusanderson.com*

155 Montgomery Street, Suite 900

San Francisco, CA 94104

Telephone: (415) 986-1400

Facsimile: (415) 986-1474

*Plaintiffs' Liaison Counsel*

Lexi J. Hazam (SBN 224457)

*lhazam@lchb.com*

**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: (415) 956-1000

Facsimile: (415) 956-100

1 Christopher A. Seeger (*pro hac vice*)  
2 *cseeger@seegerweiss.com*  
3 **SEEGER WEISS, LLP**  
4 55 Challenger Road, 6th Floor  
5 Ridgefield Park, NJ 07660  
6 Telephone: (973) 639-9100  
7 Facsimile: (973) 679-8656

8 Previn Warren (*pro hac vice*)  
9 *pwarren@motleyrice.com*  
10 **MOTLEY RICE LLC**  
11 401 9th Street NW, Suite 630  
12 Washington, DC 20004  
13 Telephone: (202) 386-9610  
14 Facsimile: (202) 232-5513

15 *Plaintiffs' Co-Lead Counsel*

16 JOSEPH G. VANZANDT  
17 **BEASLEY ALLEN CROW METHVIN**  
18 **PORTIS & MILES, P.C.**  
19 234 COMMERCE STREET  
20 MONTGOMERY, AL 36103  
21 Telephone: 334-269-2343  
22 *joseph.vanzandt@beasleyallen.com*

23 EMILY C. JEFFCOTT  
24 **MORGAN & MORGAN**  
25 220 W. GARDEN STREET, 9TH FLOOR  
26 PENSACOLA, FL 32502  
27 Telephone: 850-316-9100  
28 *ejeffcott@forthepeople.com*

RON AUSTIN  
**RON AUSTIN LAW**  
400 Manhattan Blvd.  
Harvey LA, 70058  
Telephone: (504) 227-8100  
*raustin@ronaustinlaw.com*

MATTHEW BERGMAN  
GLENN DRAPER  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104  
Telephone: 206-741-4862  
*matt@socialmediavictims.org*

1 glenn@socialmediavictims.org

2 JAMES J. BILSBORROW  
3 **WEITZ & LUXENBERG, PC**  
4 700 BROADWAY  
5 NEW YORK, NY 10003  
6 Telephone: 212-558-5500  
7 Facsimile: 212-344-5461  
8 jbilborrow@weitzlux.com

9 PAIGE BOLDT  
10 **WATTS GUERRA LLP**  
11 4 Dominion Drive, Bldg. 3, Suite 100  
12 San Antonio, TX 78257  
13 T: 210-448-0500  
14 PBoldt@WattsGuerra.com

15 THOMAS P. CARTMELL  
16 **WAGSTAFF & CARTMELL LLP**  
17 4740 Grand Avenue, Suite 300  
18 Kansas City, MO 64112  
19 T: 816-701 1100  
20 tcartmell@wcllp.com

21 JAYNE CONROY  
22 **SIMMONS HANLY CONROY, LLC**  
23 112 MADISON AVE, 7TH FLOOR  
24 NEW YORK, NY 10016  
25 Telephone: 917-882-5522  
26 jconroy@simmonsfirm.com

27 CARRIE GOLDBERG  
28 **C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
T: (646) 666-8908  
carrie@cagoldberglaw.com

KIRK GOZA  
**GOZA & HONNOLD, LLC**  
9500 Nall Avenue, Suite 400  
Overland Park, KS 66207  
T: 913-451-3433  
kgoza@gohonlaw.com

1 SIN-TINY MARY LIU  
2 **AYLSTOCK WITKIN KREIS & OVERHOLTZ,**  
3 **PLLC**  
4 17 EAST MAIN STREET, SUITE 200  
5 PENSACOLA, FL 32502  
6 Telephone: 510-698-9566  
7 mliu@awkolaw.com

8 ANDRE MURA  
9 **GIBBS LAW GROUP, LLP**  
10 1111 BROADWAY, SUITE 2100  
11 OAKLAND, CA 94607  
12 Telephone: 510-350-9717  
13 amm@classlawgroup.com

14 EMMIE PAULOS  
15 **LEVIN PAPANTONIO RAFFERTY**  
16 316 SOUTH BAYLEN STREET, SUITE 600  
17 PENSACOLA, FL 32502  
18 Telephone: 850-435-7107  
19 epaulos@levinlaw.com

20 ROLAND TELLIS  
21 DAVID FERNANDES  
22 **BARON & BUDD, P.C.**  
23 15910 Ventura Boulevard, Suite 1600  
24 Encino, CA 91436  
25 Telephone: (818) 839-2333  
26 Facsimile: (818) 986-9698  
27 rtellis@baronbudd.com  
28 dfernandes@baronbudd.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
T: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

DIANDRA "FU" DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**

505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellolevitt.com

ROBERT H. KLONOFF  
**ROBERT KLONOFF, LLC**

2425 SW 76TH AVENUE  
PORTLAND, OR 97225  
Telephone: 503-702-0218  
klonoff@usa.net

HILLARY NAPPI  
**HACH & ROSE LLP**

112 Madison Avenue, 10th Floor  
New York, New York 10016  
Tel: 212.213.8311  
hnappi@hrsclaw.com

ANTHONY K. BRUSTER  
**BRUSTER PLLC**

680 N. Carroll Ave., Suite 110  
Southlake, TX 76092  
(817) 601-9564  
akbruster@brusterpllc.com

FRANCOIS M. BLAUDEAU, MD JD FACHE  
FCLM  
**SOUTHERN INSTITUTE FOR MEDICAL AND  
LEGAL AFFAIRS**

2762 B M Montgomery Street, Suite 101  
Homewood, Alabama 35209  
T: 205.564.2741  
francois@southernmedlaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**

31 HUDSON YARDS, 11TH FLOOR  
NEW YORK, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

*Attorneys for Plaintiffs*

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3  
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